

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JASON SHEROD BALDWIN

NO. 3:20-MJ-000782-BN

**MOTION FOR DETENTION**

The United States moves for pre-trial detention of defendant, **Jason Sherod Baldwin** pursuant to 18 U.S.C. § 3142.

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

- Crime of violence (18 U.S.C. §3156);
- Maximum sentence life imprisonment or death
- 10 + year drug offense
- Felony, with two prior convictions in above categories
- Serious risk defendant will flee
- Serious risk obstruction of justice
- Felony involving a minor victim
- Felony involving a firearm, destructive device, or any other dangerous weapon
- Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release that will reasonably assure (check one or both):

- Defendant's appearance as required
- Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant because:

- Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)
- Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)
- Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201, 2251
- Previous conviction for “eligible” offense committed while on pretrial bond

4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing,

- At first appearance
- After continuance of 2 days (not more than 3).

DATED this 29th day of July 2020.

Respectfully submitted,

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